UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

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GERALD H. THOMPSON, JR. JUDY F. THOMPSON,

Case No. 3:17-bk-01497-JAF Chapter 13

Debtors.

OBJECTION BY ALLY FINANCIAL TO DEBTOR'S MOTION TO VALUE SECURED CLAIM 3-1

Ally Financial, by and through its undersigned attorney, hereby files its Objection to Debtor's Motion to Value Secured Claim 3-1 (Doc. No. 26), and would show:

- 1. The claim of Ally Financial is secured by a 2014 Ford F-250 XLT, VIN 1FT7W2BT6EEB65867. This is a 910 Claim.
- 2. The debt was incurred on November 29, 2015, within the 910-day period preceding the date of the filing of this Petition.
- 3. If Debtors are attempting to value Creditor's property and reduce Creditor's secured claim pursuant to 11 U.S.C. 506(a), Debtors are in violation of 11 U.S.C. 1325(a).
- 4. Ally Financial will withdraw this objection if the plan is modified to either pay the claim on its original terms, or pay the claim with interest at 6% over the life of the Plan.

DATED: October 19, 2017.

Andrew W. Houchins Florida Bar No. 59017

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Attorney for Creditor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served on this ______ day of October, 2017, by electronic notice if registered in the Electronic Case Filing system, otherwise by first class postage prepaid U.S. Mail to: Gerald H. Thompson, Jr., 3640 Newcomb Rd., No. 70, Jacksonville FL 32218, Judy F. Thompson, 3640 Newcomb Rd., No. 70, Jacksonville FL 32218, Debtors, Douglas C. Higginbotham, 925 Forest Street, Jacksonville, FL 32204, Attorney for Debtors, Douglas W. Neway, PO Box 4308, Jacksonville, FL 32201-4308, Office of the U.S. Trustee, 400 W. Washington St., Suite 1100, Orlando, FL 32801.

RUSH, MARSHALL, JONES and KELLY, P.A. Attorneys for Creditor

SEND ALL NOTICES TO:

RUSH, MARSHALL, JONES and KELLY, P.A. Attn:Andrew W. Houchins Post Office Box 3146 Orlando, FL 32802-3146

By: Andrew W. Houchins, for the firm

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